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FILED IN UNITED STATES DISTRICT  
COURT, DISTRICT OF UTAH  
**JUN 22 2016**  
BY **D. MARK JONES, CLERK**  
DEPUTY CLERK

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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

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|---------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA, | : |                                 |
|                           | : | FELONY COMPLAINT                |
| Plaintiff,                | : |                                 |
|                           | : | VIO. <b>2:16mj 353-DBP</b>      |
| vs.                       | : | 18 U.S.C. § 844(f)              |
|                           | : | Attempted Damage to Federal     |
| WILLIAM KEEBLER,          | : | Property by Means of Fire or    |
|                           | : | Explosive                       |
| Defendant.                | : |                                 |
|                           | : | Magistrate Judge DUSTIN B. PEAD |

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Before the Honorable Dustin Pead, Magistrate Judge for the District of Utah, appeared the undersigned, who on oath deposes and says the following:

**COUNT 1**  
**18 U.S.C. § 844(f)**  
**Attempted Damage to Federal Property by Means of Fire or Explosive**

On or between June 20, 2016 and June 22, 2016, in the Central Division of the District of Utah,

**WILLIAM KEEBLER**

the defendant herein, did maliciously damage, destroy, and attempt to damage and attempt to destroy, a building and other personal or real property, to wit: buildings and/or cabins in Mt. Trumbull, Arizona, in whole and in part owned, possessed, or leased to, the United States, to wit:

property owned by the United States and managed by Department of Interior, Bureau of Land Management, a department and agency of the United States, and an organization and institution receiving Federal financial assistance, by means of fire and explosive, in violation of Title 18, United States Code, Section 844(f).

#### STATEMENT OF PROBABLE CAUSE

1. William Keebler, hereafter referred to as (“KEEBLER”) is the commander of a citizen militia group called the Patriots Defense Force (“PDF”), headquartered in Stockton, Utah. KEEBLER was present during the Bunkerville, Nevada armed stand-off against the Bureau of Land Management (BLM) in 2014, and posted on his Facebook page that he was on the Bundy Ranch for 13 days. There were a large number of participants in the stand-off including Cliven Bundy, who was recently arrested in Portland, Oregon, for activity related to the stand-off in Nevada. Additionally, KEEBLER was an associate of Lavoy Finicum, a rancher from Arizona who also participated in a takeover of federal property at the Malheur Wildlife Refuge near Burns, Oregon and was subsequently killed by law enforcement while resisting arrest.

2. For several months, FBI undercover employees (UCEs) have been members of the PDF. The UCEs have had face-to-face interactions with KEEBLER as well as cellular telephone conversations and communications. The UCEs have participated in “field training exercises” (FTXes) organized by KEEBLER in which the PDF members practice shooting at targets and receive instruction from KEEBLER regarding firearms and military and survival tactics. KEEBLER has continued to recruit, organize, and prepare the PDF for the day when they can take part in an anti-government action with other militia groups similar to the event in Bunkerville, Nevada. On May 15, 2015, KEEBLER talked to PDF members/UCEs about putting teams together and “going on the offensive.”

3. On February 21, 2016, KEEBLER met with members of his militia group. During this meeting the group talked about gathering intelligence on potential targets. KEEBLER determined that the group would conduct reconnaissance on a Bureau of Land Management (BLM) office in Salt Lake. After the group had conducted reconnaissance and driven by the BLM office near the Gateway Mall in Salt Lake City, KEEBLER determined this was a poor target due to high commercial and homeless activity in the immediate area. KEEBLER liked the idea of targeting a facility with less visibility.

4. On March 19, 2016, KEEBLER organized and led an FTX for the PDF militia group. KEEBLER described the direction the PDF was going to focus on. KEEBLER said the government had been allowed to harass people, but the repercussions were going to start. KEEBLER had previously said the BLM was overreaching their authority to implement grazing restrictions on ranchers. KEEBLER had opined the land belonged to “the people” and could be used responsibly at the American people’s discretion. KEEBLER said the PDF was going to target BLM facilities in the “middle of nowhere.” KEEBLER stated the PDF would sneak in and severely damage vehicles or buildings. KEEBLER requested a PDF member/UCE who has explosive materials expertise, to build an explosive device that could disable a BLM vehicle or damage a building. KEEBLER made it clear he didn’t plan on blowing people up for now, but he wanted his group to be prepared to escalate things, and take people out if necessary.


5. On April 08, 2016, the PDF militia member/UCE tasked with building KEEBLER an explosive device showed KEEBLER a video of a 6-inch pipe bomb blowing up some abandoned office furniture in the mountains of southern Utah. KEEBLER seemed impressed and wanted to know the member’s ability to make more explosive devices. The PDF member/UCE stated that he could provide KEEBLER with more explosive devices. KEEBLER stated he had a

target in mind; the BLM building located at Mount Trumbull in Arizona. KEEBLER had conducted reconnaissance on the BLM facility in Arizona in October, 2015, with Lavoy Finicum. A PDF member/UCE who was accompanying KEEBLER at the time took pictures of the BLM facility at Mount Trumbull.

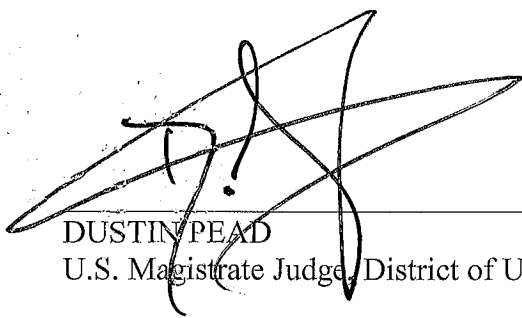
6. At a subsequent FTX on May 14, 2016, KEEBLER stated the main target for explosives was going to be the BLM facility at Mount Trumbull, Arizona. KEEBLER stated he wanted two bombs, both twice the size of the one he had seen on the video on April 08, 2016. One of the bombs was to be a remote control device capable of being detonated by a walkie-talkie. The other bomb was to be ignited by a time fuse. The first bomb was going to be placed near one of the cabins at the Mount Trumbull BLM facility. The second bomb was to be used against law enforcement if they got stopped while driving to or from Mount Trumbull. The PDF determined they would drive down to Arizona on June 20, 2016 and detonate the explosive device against one of the BLM cabins on the night/morning of June 21, 2016. KEEBLER stated they should drive directly back to Salt Lake City to put as much distance as possible between them and the damage they caused at the BLM facility. The weekend of June 20, 2016, was chosen as a good day because a militia group in Washington State would be conducting a gathering that weekend. The PDF thought they could get someone attending the Washington State gathering to create an alibi for them if needed.

7. On June 20, 2016, Keebler departed Stockton, Utah and began traveling to the target location in Mount Trumbull, Arizona in order to carry out the planned attack targeting the United States owned property managed by the United States Bureau of Land Management. Keebler arrived at Mount Trumbull later this day and conducted reconnaissance on the facility at Mount Trumbull with PDF militia members/UCes.

8. In the late evening hours of June 21, 2016, an inert explosive device was placed against the door of one of the BLM cabins in Mount Trumbull. After the device was placed against the door, Keebler was handed a remote detonation device. Keebler then pushed the detonator button multiple times in order to remotely detonate the inert explosive. After the remote detonation, Keebler departed Mount Trumbull and returned to Utah. Keebler was later arrested on the morning of June 22, 2016 in Nephi, Utah by the Federal Bureau of Investigation.

  
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STEVEN DANIELS  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed before me this 22<sup>nd</sup> day of June, 2016

  
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DUSTIN PEAD  
U.S. Magistrate Judge, District of Utah